TOPICAL REPORT CSTC TOPIC 2003-E

CHEMICAL EXPOSURES DURING CLOSURE ACTIVITIES

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The Team

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Project Overview

Ohio Area Office Projects
Rocky Flats Environmental Technology Site
Savannah River Site

Chemical Regulatory Taxonomy

DOE Contractor 10 CFR 850, 10 CFR 850, 29 CFR 1910, 29 CFR 1960 1926 Statutes, Regulations FEOSH Gen. Ind. Stds. DOE O 440.1/DOE G 440.1-1/ Directives, Guides DOE-G-440.1-3 Site Program Interpretation HAZCOM, HAZWOPER Specific Exposure Standards Closure Lifecycle **Activities** PELs, STELs, TLVs

Closure Lifecycle Activities

- Containerized Chemical Removal
- Decontamination
- Surveillance and Maintenance
- Decommissioning
- Demolition
- Soil Remediation

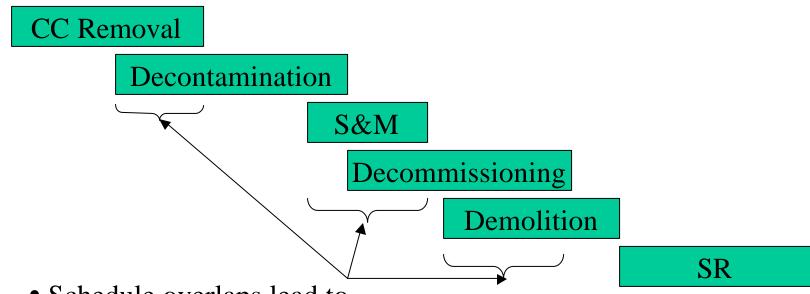
Closure Lifecycle Activities

- Containerized Chemical Removal
- Decontamination
- Surveillance and Maintenance
- Easy-to-ManageChemical ExposurePotentials(Worker Risk)

- Decommissioning
- Demolition
- Soil Remediation

Difficult-to-ManageChemical ExposurePotentials(Greater Worker Risk)

Closure Lifecycle Activities



• Schedule overlaps lead to more complex challenges but they represent closure realities

Other Challenges

- Contract Reform Initiatives
- Prototypical Work Tasks
- Experience Gap
- Characterization Activities
- Work Orchestration

Case Study Collection

- Case Studies were:
 - obtained for each lifecycle area where possible
 - reviewed for common themes
 - Chemical Exposure Management Practices were revealed
 - Good Exposure Minimization Practices
 - Practices to Avoid

Case Studies - CC Removal

- Packaging Lead Acid Batteries at FCP
- Hand Sorting and Preparation of Drummed Mixed Waste

Case Studies - Decontamination

- Building 771 System 22 Draining and Process Pipe Removal
- InstaCote Oversized LLW to transport oversized objects to Disposal Facilities
- Dismantlement and Demolition of a Decommissioned Uranium Refinery Building

Case Studies - S & M/ Decommissioning

- No examples of exposure sampling during surveillance and maintenance (S&M)
- Prior sampling experience indicates that routine S&M activities are generally lowhazard, although a few exceptions exist
- Decommissioning activity case studies not yet reviewed



Cast Studies - Demolition

- Size Reduction of 1950's Era Uranium Metals Processing Building
- Torch-Cutting Task During Heavy Water Facility Demolition at SRS
- Torch-Cutting Task during River Boat Dock Demolition at the SRS

Case Studies - Soil Remediation

- Waste Pit Excavation and Soil/Debris Processing
- Washing of Uranium Contaminated Soil
- Soil/Debris Excavation and Deposition at an On-Site Spill Disposal Facility

Conclusions

- Successful Exposure Minimization Practices:
 - Decontaminate objects/structures/equipment prior to decommissioning or demolition
 - Use engineering controls, e.g., ventilation and containment to reduce likelihood of personnel exposures.
 - Be conservative in choosing Personal Protective Equipment until sampling results warrant reduction in protection
 - Provide adequate planning time for closure activities
 - Provide administrative controls where necessary.

Conclusions

- Practices to avoid
 - Hasty work planning
 - Manually handling contaminated items
 - Reducing Personal Protective Equipment regimens without verifiable sampling results
 - Using Personal Protective Equipment in lieu of addressing engineering control inadequacies
 - Working on any closure activity without the benefit of adequate characterization data

Conclusions

- Closure Activities differ from DOE Operations with respect to personnel available to support information gathering activities
- Time-tested, successful exposure minimization practices do work
- Additional Case Study information should continue to be gathered to provide an experience-based resource to DOE.

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